

to NTSC Channel 39 in Allentown, PA, but as pointed out previously, this spacing is consistent with other DTV-NTSC short spacings used in the allotment process.

DTV Channel 50. A DTV channel 50 allotment for Atlantic City would be adjacent to DTV Channel 49 but within the requirements of 73.622(d)(1)¹⁴. Channel 50 DTV would be short spaced to NTSC Channel 50 in Montclair, NJ by 51.16 km, again not atypical. A proposed Channel 50 DTV in Atlantic City does not quite meet the 100 km spacing requirement to NTSC Channel 57 in Philadelphia, PA (99.43 vrs 100 km). The channel also has the potential for DTV use in Atlantic City.

Of the studied channels, Channels 8, 25, and 50 appear to be a better allotment choice than Channel 46 for DTV service in Atlantic City. By allotting DTV either Channel 8, 25, or 50 to WWAC, the substantial substandard DTV-DTV co-channel spacing for a pair of stations within the Philadelphia DMA could be improved substantially. The use of any of these channels would still provide an in core DTV allotment to WWAC.

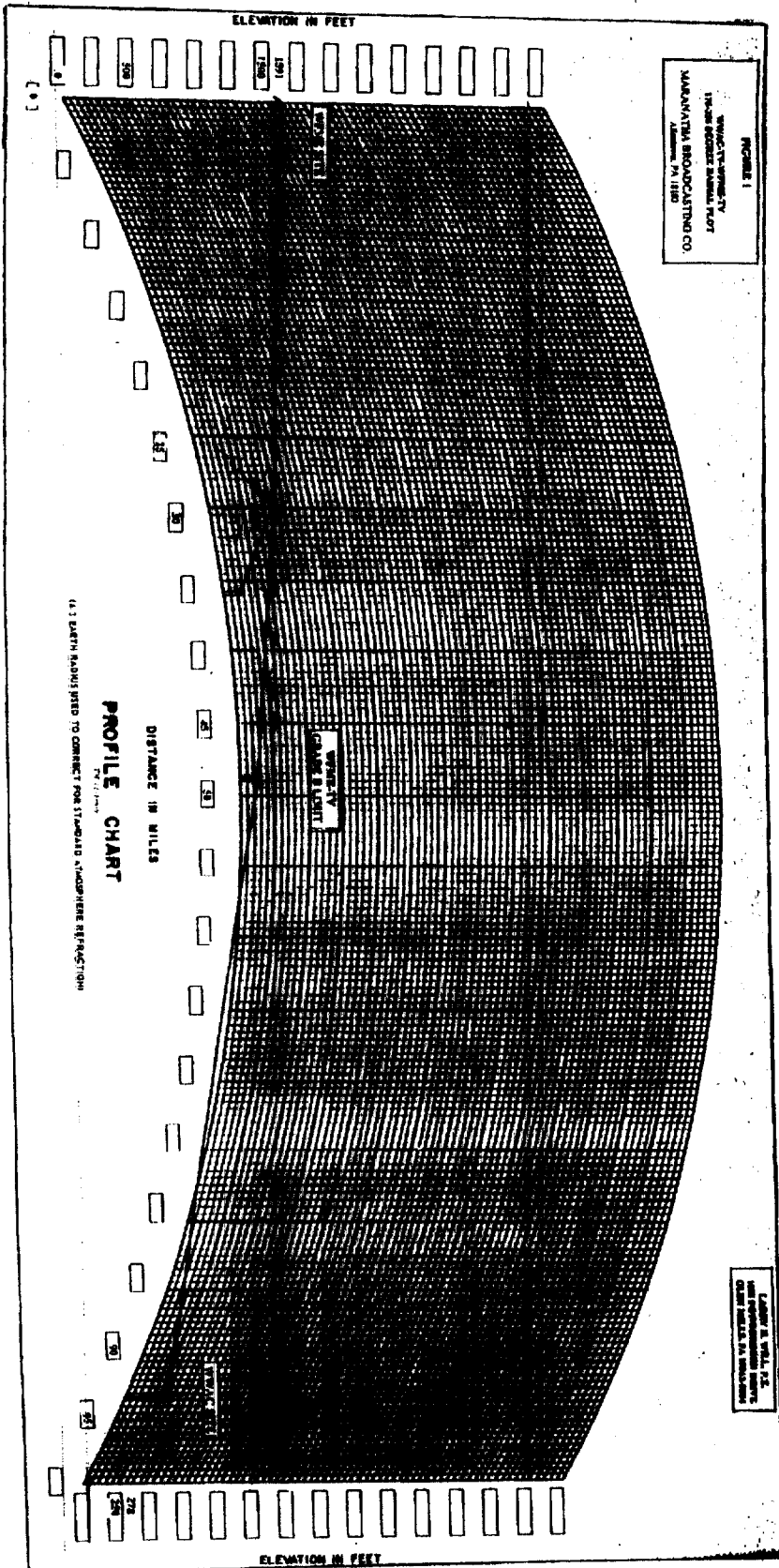
5. CONCLUSIONS

MBC is deeply concerned about receiving a substantial short-spaced allotment as compared to the other 14 stations within the Philadelphia DMA. The situation is aggravated by the fact that both affected stations primary NTSC allotment was out of the core, making the long term future of each stations' DTV service area very uncertain. Indeed, as far as we can tell, no other DTV station has received a similar short-spaced DTV-DTV allotment. This action by the Commission has substantially impacted on the long term viability of WFMZ-TV in the digital

¹⁴ 30.41 vrs 40.2 km.

world. MBC is anxious to construct a viable DTV facility and begin operations and is concerned that its substantial investment in this technology be protected by the allotment process.

MBC has filed an application for a construction permit to build a new DTV station on Channel 46 in Allentown, Pennsylvania and to complete construction and commence operation with new DTV facilities promptly upon grant of that application. However, the Channel 46 allotments for Allentown, Pennsylvania and Atlantic City, New Jersey, will, if allowed to stand, severely limit the ability of WFMZ-TV to implement DTV in a cost effective and spectrum efficient manner. We believe that we have provided viable alternatives for the existing DTV allotment for WWAC-DT, and we respectfully request that the Commission again review the allotments within the region with a goal of eliminating a co-channel allotment that is severely short-spaced and unnecessarily restricts the ability of both stations to serve substantial population within the Philadelphia DMA.



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ATTACHMENT C

**Exhibit 1: Technical Discussion in Support of Request for
Modification of DTV Table of Allotments With Regard to Channel 46
DTV, Atlantic City NJ.**

This analysis is presented in support of a modification request with regard to a change in the Digital Table of Allotments as presented in the Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order (FCC 98-24, MM Docket #87-268). As contracted by Maranatha Broadcasting Corporation, Third Coast Broadcasting has performed a computerized analysis to present an alternative channel for the DTV allotment in the Atlantic City New Jersey area. Through this analysis, channel 8 was found as an alternative to channel 46 and the following discusses the methods and results of this analysis.

Methodology:

In the channel analysis, the table of allotments from the MO&O was input into a slightly modified version of the FCC "Anneal" program, the FORTRAN program which the FCC used to allocate the digital channels in DTV proceedings and which resulted in the final DTV table of allotments. The full United States input file was used in order to avoid any ripple effect caused by far distant stations on the calculation ability of the program. This Anneal program was modified with the addition of an "nlpok" logical function which, when presented with proper data, forces Anneal to "dodge" a selected channel and to mathematically choose an alternative channel, using the same criteria as the first channel. This nlpok algorithm has been submitted to the Commission and is a matter of public record. The only data input to nlpok was channel 46D, Atlantic City, for the DTV channel change and channel 50D Atlantic City, to avoid a non-co-located adjacent channel problem. All other markets were left as indicated in the Table of Allotments. The Anneal program indicated channel 8 as its result.

Channel 8 was then input into the "flr" program in accordance with the criteria of FCC publication OET-69 (flr: FCC Longley-Rice program, as revised, March 16, 1998) to determine the actual interference percentages of the baseline channel 46 selection and then the channel 8 modification. In this analysis, only the channels which were affected by channel 8 were used for the result, however, a baseline was run using the allotted channel 46 as a reference. In running the flr program with a channel 46 baseline and then with the proposed channel 8, any differences in population coverage or areas covered would be obvious. The output of the flr program run is submitted as Exhibit #2.

Results:

After running the fir program, the alternative channel 8 was found to not change the coverage of the initially proposed channel 46 in any way and provided an interference free, 100% service area replication. The other stations affected by this proposed channel change were as follows:

Analysis of: 8N PA LANCASTER (Atlantic City DTV on Channel 46)

	POPULATION	AREA (sq km)
within Noise Limited Contour	3675233	28274.0
not affected by terrain losses	2859869	23984.9
lost to NTSC IX	695344	2253.4
lost to additional IX by ATV	5567	387.0
lost to all IX	700911	24.5% 2640.4

Analysis of: 8N PA LANCASTER (Atlantic City DTV on Channel 8)

	POPULATION	AREA (sq km)
within Noise Limited Contour	3675233	28274.0
not affected by terrain losses	2859869	23984.9
lost to NTSC IX	695344	2253.4
lost to additional IX by ATV	20326	1596.3
lost to all IX	715670	25.0% 3849.7

The difference in the two interference percentages with Lancaster PA is 0.5%.

Analysis of: 8A NJ NEWTON (Atlantic City DTV on Channel 46)

	POPULATION	AREA (sq km)
within Noise Limited Contour	884998	13636.9
not affected by terrain losses	819120	12933.3
lost to NTSC IX	168399	1254.3
lost to additional IX by ATV	1539	124.6
lost to ATV IX only	11418	197.0
lost to all IX	169938	20.74% 1379.0
percent match ATV/NTSC	85.8	93.6

Analysis of: 8A NJ NEWTON (Atlantic City DTV on Channel 8)

	POPULATION	AREA (sq km)
within Noise Limited Contour	884998	13636.9
not affected by terrain losses	819120	12933.3
lost to NTSC IX	168399	1254.3
lost to additional IX by ATV	1620	148.8
lost to ATV IX only	35264	450.3
lost to all IX	170019	20.76% 1403.1
percent match ATV/NTSC	85.8	93.6

The difference in the two interference percentages with Newton NJ is 0.02%.

According to the preceding analysis, the proposal creates extremely slight interference to Newton NJ and Lancaster PA, in both cases creating less than 1% additional interference. However, after the final adoption of the rules, this type of change would not be permissible, due to the fact that both stations receive more than 10% interference.

As a basis for the analysis, a coverage replication was calculated to cover the same area with channel 8 as with channel 46. The proposed facilities are as follows:

Analysis of: 53N NJ ATLANTIC CITY (no change)

	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 8A NJ ATLANTIC CITY

HAAT 85.0 m, ATV ERP 16.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

With the proposed channel and ERP change there would be no calculated change in the coverage area or population covered between the two channels. With the very minimal interference that would be caused, channel 8 is presented as an alternative to the previously allotted channel 46 in the Atlantic City NJ area.


 Robert W. Fisher
 Communications Consultant

Exhibit #2: FLR Program Results**Baseline Analysis with DTV Channel 46:**

```
# Comments start with the pound sign which may be at the beginning
# of the line or inside it. Everything between the pound sign and
# the next newline is ignored.

# Empty lines are also ignored.

# Curly brackets surround name of highest category of input data.
# Square brackets denote subcategories, and parentheses denote a
# third level of subcategory.

# Data lines, like those specifying TV station vertical patterns
# below, are read as vectors. The components are separated by white
# space and character strings are quoted. The leading component may
# be the vector name enclosed in parentheses.
#
# The position of data items is critical because the program uses
# format statements to read this file. The program writes out what it
# reads, so if you have a problem compare input with output to make
# sure the data read by the program is correct.
#
```

{Macros}

```
[TV Engineering Data Base]
(TVDB) "tv_main.dbs"
```

```
[Directional Antenna Data Base]
(DADB) "../data/dadb/dadb.lis"
```

```
[HAAT Data Base]
(HTDB) "haat_db.dbs"
```

[Propagation curve data point files]

```
#
# The order of the following files needs to be
# preserved F50/50, F50/10, F50/90 with file
# low vhf, high vhf uhf for each set of curves
#
```

```
(PCDB)
../data/r6602/f55lv.dat
../data/r6602/f55hv.dat
../data/r6602/f55u.dat
../data/r6602/f51lv.dat
../data/r6602/f51hv.dat
../data/r6602/f51u.dat
../data/r6602/f59lv.dat
../data/r6602/f59hv.dat
../data/r6602/f59u.dat
```

```
[Population data files path]
(POPDB) "../data/population"
```

[List of stations to be analyzed for coverage and IX]

```
#
# The following file contains the list of data base
# stations to analyze
#
```

(Analysis List File) "stations.dat"

(Program Options)

For Replicate = no, DTV facilities will be determined from file
tv main.dbs unless the ERP given in that file is -1.0. In the
latter case, the "no" is overridden.

(Replicate) "no"

(Propagation Curves) #Define which FCC curves are used in the analysis

Define curves to use for service prediction and interference.
Define for both NTSC and ATV.
Values are % time (F50/50, F50/10 F50/90).

NTSC Curves
Service Interference

50.0 10.0

ATV Curves
Service Interference

90.0 10.0

(Longley-Rice Percentiles) #Define location/time/confidence % for L-R comp.

Need to define % to use for service prediction and interference
Need to define for both NTSC and ATV

NTSC Computations

Service			Interference		
Time	Location	Confidence	Time	Location	Confidence
50.0	50.0	50.0	10.0	50.0	50.0

ATV Computations

Service			Interference		
Time	Location	Confidence	Time	Location	Confidence
90.0	50.0	50.0	10.0	50.0	50.0

(Receive Antenna Use)

State if receive antenna patterns are to be considered

Apply to NTSC Apply to ATV
"yes" "yes"

(Apply Xmit Vertical Pattern)

State if vertical antenna patterns are to be considered

Apply to NTSC Apply to ATV
"yes" "yes"

(Apply Xmit Horizontal Pattern)

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```

#
# State if horizontal antenna patterns are to be considered. If
# Replicate was set to "no" above then the switch for ATV here is
# ignored.

#
# Apply to NTSC      Apply to ATV
#
#      "yes"          "yes"

(Analysis Radials)
#
# Noise limited contours are determined by calculating the distance to
# the contour on a number of evenly spaced radials. Define the number
# to use here. The number must be between 36 and 360.
#
# Put number in columns 8-10
#
# Number of radials
#
#      72

(Channel Relationships Considered)
#
# Define what channel relationships to consider when analyzing
# NTSC to NTSC interference.
#
# The blank line at the end is necessary to terminate the list.
#
# Channel Offset      yes/no
# -----
#
# (N-to-N)
#      +0              "yes"
#      +1              "yes"
#      +2              "yes"
#      +3              "yes"
#      +4              "yes"
#      +5              "no"
#      +7              "yes"
#      +8              "yes"
#      -1              "yes"
#      -2              "yes"
#      -3              "yes"
#      -4              "no"
#      -5              "no"
#      -7              "yes"
#      -8              "yes"
#      +14             "yes"
#      +15             "yes"

#
# Define what channel relationships to consider when analyzing
# NTSC to ATV interference.
#
# The blank line at the end is necessary to terminate the list.
#
# Channel Offset      yes/no
# -----
#
# (N-to-A)
#      +0              "yes"

```

+1	"yes"
+2	"no"
+3	"no"
+4	"no"
+5	"no"
+7	"no"
+8	"no"
-1	"yes"
-2	"no"
-3	"no"
-4	"no"
-5	"no"
-7	"no"
-8	"no"
+14	"no"
+15	"no"

Define what channel relationships to consider when analyzing
ATV to NTSC interference.

The blank line at the end is necessary to terminate the list.

# Channel Offset	yes/no
# -----	-----

(A-to-N)

+0	"yes"
+1	"yes"
+2	"yes"
+3	"yes"
+4	"yes"
+5	"no"
+7	"yes"
+8	"yes"
-1	"yes"
-2	"yes"
-3	"yes"
-4	"yes"
-5	"no"
-7	"yes"
-8	"yes"
+14	"yes"
+15	"yes"

Define what channel relationships to consider when analyzing
ATV to ATV interference.

The blank line at the end is necessary to terminate the list.

# Channel Offset	yes/no
# -----	-----

(A-to-A)

+0	"yes"
+1	"yes"
+2	"no"
+3	"no"
+4	"no"
+5	"no"
+7	"no"

```

+8          "no"
-1          "yes"
-2          "no"
-3          "no"
-4          "no"
-5          "no"
-7          "no"
-8          "no"
14          "no"
15          "no"
#
# Indicate how problem area is to be defined. It can be defined as
# the NLC of a station in in the data base or by a rectangular area
# with geographical coordinate boundaries. When the program is run in
# the pairwise mode (compile-time option) the problem area for each
# pair is automatically set to the NLC of the NTSC station, bypassing
# the choice made here.
#
# Define the problem area below by using the words Station or Rectangle
# in quotes. The case is necessary.
#
(PProblem Area Definition) "Station"

(PProblem Area Station)
#
# Station is defined by city, state, channel, ATV or NTSC
# Place each in quotes - limit on city name is 20 characters
#
#      city          state      channel      ATV/NTSC
#
#      "Denver"      "CO"        "32"         "ntsc"

(PProblem Area Rectangle)
# SE Latitude SE Longitude NW Latitude NW Longitude
# "39-48-19" "72-49-54" "41-36-38" "75-12-29"
#
# The following value is the size of the cells within the the problem
# area grid. The cells are square so only a single value is needed.
# The value is in km and is the length of the cell side.
#
(PProblem Area Cell Size) 2.000

{TV Station Parameters}

[Vertical Pattern]

(Type Vertical Pattern) "FCC"

#      Declination Angles in Degrees      Relative Gain
#      -----
# Band      Tilt      Theta(1)      Theta(2)      Volts(1)      Volts(2)
#-----
(Low VHF)   0.00      7.00      20.00      0.40      0.22
(High VHF)  0.00      3.00      6.00      0.40      0.22
(UHF)       0.50      2.50      5.00      0.40      0.16

(Type Vertical Pattern) "PSWP3"
#

```

#	ANGLE	L_VHF_N	L_VHF_A	H_VHF_N	H_VHF_A	UHF_N	UHF_A
#							
	0.75	1.000	1.000	1.000	1.000	1.000	1.000
	1.50	1.000	1.000	0.950	0.970	0.740	0.880
	2.00	0.990	0.990	0.860	0.940	0.520	0.690
	2.50	0.980	0.980	0.730	0.890	0.330	0.460
	3.00	0.970	0.970	0.600	0.820	0.220	0.260
	3.50	0.950	0.950	0.470	0.730	0.170	0.235
	4.00	0.930	0.930	0.370	0.650	0.150	0.210
	5.00	0.880	0.880	0.370	0.470	0.130	0.200
	6.00	0.820	0.820	0.370	0.330	0.110	0.150
	7.00	0.740	0.740	0.370	0.280	0.110	0.150
	8.00	0.637	0.637	0.310	0.280	0.110	0.150
	9.00	0.570	0.570	0.220	0.280	0.110	0.150
	10.00	0.480	0.480	0.170	0.250	0.110	0.150

(Pattern Selection) "PSWP3" #Set to FCC or PSWP3 to select pattern

[Horizontal Pattern]

Source File will always be same as TVDB.

Whether a horizontal pattern is used or not used is set in the Program Options section above.

#

() #This is required so the input routine knows to go on the next section

[HAAT]

(Source File) "HTDB" #If TVDB use single value, if HTDB use computed values

(Number of radials used to determine HAAT) 8 #Only used with HTDB (MAX 360)

#	Minimum Height in Meters		
#	-----		
#	Low VHF	High VHF	UHF
(NTSC Minima)	33.0	33.0	33.0
(Prototype ATV)	305.0	305.0	365.0

[ERP]

(Source File) "TVDB"

#	ERP limits in Kilowatts		
#	-----		
#	Low VHF	High VHF	UHF
(NTSC Minima)	0.1	0.1	0.1
(ATV Minima)	1.0	3.2	50.0
(Prototype ATV)	45.0	160.0	1000.0
(ATV Maxima)	100.0	316.0	1000.0
(Vacant Allotments)	0.0	0.0	0.0

(Receiving Antenna)

[Patterns]

(Pattern Type) "CCIR"

#	Azimuth Angles in Degrees				Relative Gain, dB			
#	-----				-----			
# Band	Phi(1)	Phi(2)	Phi(3)	Phi(4)	Gain(1)	Gain(2)	Gain(3)	Gain(4)
#-----	-----	-----	-----	-----	-----	-----	-----	-----
(Low VHF)	0.0	50.0	70.0	90.0	0.0	0.0	-6.0	-6.0
(High VHF)	0.0	25.0	60.0	90.0	0.0	0.0	-12.0	-12.0
(UHF)	0.0	20.0	60.0	90.0	0.0	0.0	-16.0	-16.0

(Pattern Type) "PSWP3"

```

#      Front-to-back Ratios, dB
#      -----
#      Low VHF  High VHF  UHF
#      -----
(NTSC)      6.0      6.0      6.0
(ATV)       10.0     12.0     14.0
(Exponent)  4.0

```

```

#      Receive Antenna Gain, dB
#      -----
#      Low VHF  High VHF  UHF
#      -----
(NTSC)      0.0      0.0      0.0
(ATV)       4.0      6.0     10.0

```

```

[Height]
(Rooftop)  10.0 (Rooftop)  10.0 #Meters above ground

```

```

[Pattern to be Used]

```

```

(Pattern Selection) "PSWP3" #Set to PSWP3 or CCIR to select pattern

```

```

{Noise Threshold} #Field strength in dB relative to 1 microvolt/meter

```

```

[NTSC]
(Low VHF)  47.00
(High VHF) 56.00
(UHF)      64.00

```

```

[ATV]
(Low VHF)  28.00
(High VHF) 36.00
(UHF)      41.00

```

```

{Desired Signal Levels} #dB relative to 1 microvolt/meter

```

```

[NTSC]
#      Low VHF  High VHF  UHF
#      -----
(Moderate) 68.00      71.00      74.000 #Grade A levels
(Strong)   74.00      77.00      80.000 #Principal City

```

```

[ATV]
#      Low VHF  High VHF  UHF
#      -----
(Moderate) 53.00      52.00      64.000 #Arbitrary values--further
(Strong)   58.00      58.00      70.000 #study required.

```

```

{D/U Ratios} #Use -1000.0 dB for missing values.

```

```

[N-to-N]
#
# Weak - Ratio for Weak Desired Level
# Moderate - Ratio for Moderate Desired Level
# Strong - Ratio for Strong Desired Level
#
# Weak is for regular type computations. Moderate and Strong are used
# for special calculations.
#
# It is important that the order below is preserved:
# co-channel first, +1, +2, ..., +8, -1, -2, ..., -8, +14, +15.
#

```

```

# Offset      Weak      Moderate      Strong
# -----      ----      -
#
(Ratios)
0      28.00      28.00      28.00
1     -13.00     -13.00     -13.00
2     -29.00     -29.00     -29.00
3     -34.00     -34.00     -34.00
4     -23.00     -23.00     -23.00
5    -1000.00    -1000.00   -1000.00
7     -33.00     -33.00     -33.00
8     -41.00     -41.00     -41.00
-1     -3.00      -3.00      -3.00
-2    -26.00     -26.00     -26.00
-3    -33.00     -33.00     -33.00
-4    -1000.00   -1000.00   -1000.00
-5    -1000.00   -1000.00   -1000.00
-7     -30.00     -30.00     -30.00
-8     -32.00     -32.00     -32.00
14     -25.00     -25.00     -25.00
15      -9.00      -9.00      -9.00

```

[A-to-N]

```

#
# Weak - Ratio for Weak Desired Level
# Moderate - Ratio for Moderate Desired Level
# Strong - Ratio for Strong Desired Level
#

```

```

# Offset      Weak      Moderate      Strong
# -----      ----      -
#
(Ratios)
0      34.00      34.00      34.00
1     -17.00     -17.00     -17.00
2     -28.00     -28.00     -28.00
3     -34.00     -34.00     -34.00
4     -25.00     -25.00     -25.00
5    -1000.00    -1000.00   -1000.00
7     -43.00     -43.00     -43.00
8     -43.00     -43.00     -43.00
-1     -14.00     -14.00     -14.00
-2     -24.00     -24.00     -24.00
-3     -30.00     -30.00     -30.00
-4     -34.00     -34.00     -34.00
-5    -1000.00   -1000.00   -1000.00
-7     -35.00     -35.00     -35.00
-8     -32.00     -32.00     -32.00
14     -33.00     -33.00     -33.00
15     -31.00     -31.00     -31.00

```

[N-to-A]

```

#
# Weak - Ratio for Weak Desired Level
# Moderate - Ratio for Moderate Desired Level
# Strong - Ratio for Strong Desired Level
#

```

```

# Offset      Weak      Moderate      Strong
# -----      ----      -
#
(Ratios)
0      2.00      2.00      2.00

```

1	-49.00	-49.00	-49.00
2	-59.86	-59.86	-59.86
3	-62.49	-62.49	-62.49
4	-58.00	-58.00	-58.00
5	-1000.00	-1000.00	-1000.00
7	-58.00	-58.00	-58.00
8	-58.00	-58.00	-58.00
-1	-48.00	-48.00	-48.00
-2	-62.45	-62.45	-62.45
-3	-61.79	-61.79	-61.79
-4	-58.00	-58.00	-58.00
-5	-1000.00	-1000.00	-1000.00
-7	-58.00	-58.00	-58.00
-8	-58.00	-58.00	-58.00
14	-58.00	-58.00	-58.00
15	-58.00	-58.00	-58.00

{A-to-A}

Weak - Ratio for Weak Desired Level
Moderate - Ratio for Moderate Desired Level
Strong - Ratio for Strong Desired Level

Adjacent channel values used for 6th R&O table were -43 dB for
n+1, -42 dB for n-1. The values below allow for degradation from
transmitter splatter. They are about 20 dB poorer.

# Offset	Weak	Moderate	Strong
# -----	----	-----	-----
#			
# (Ratios)			
0	15.00	15.00	15.00
1	-21.00	-21.15	-21.15
2	-59.13	-59.13	-59.13
3	-61.53	-61.53	-61.53
4	-55.40	-55.40	-55.40
5	-1000.00	-1000.00	-1000.00
7	-63.00	-63.00	-63.00
8	-62.40	-62.40	-62.40
-1	-23.00	-23.09	-23.09
-2	-60.52	-60.52	-60.52
-3	-60.61	-60.61	-60.61
-4	-60.61	-60.61	-60.61
-5	-1000.00	-1000.00	-1000.00
-7	-63.00	-63.00	-63.00
-8	-62.80	-62.80	-62.80
14	-63.00	-63.00	-63.00
15	-62.90	-62.90	-62.90

{Maximum Analysis Distance}

Define by channel relationships the maximum distance from an
undesired station to an analysis point. Stations beyond these
distances will not be considered when analyzing NTSC to NTSC
interference.

The blank line at the end is necessary to terminate the list.

# Channel Offset	Max Distance - KM
# -----	-----
#	

(N-to-N)

0	300.0
1	100.0
2	35.0
3	35.0
4	35.0
7	100.0
8	35.0
-1	100.0
-2	35.0
-3	35.0
-7	100.0
-8	35.0
14	100.0
15	125.0

Define by channel relationships the maximum distance from an
undesired station to an analysis point. Stations beyond these
distances will not be considered when analyzing NTSC to ATV
interference.

The blank line at the end is necessary to terminate the list.

Channel Offset Max Distance - KM

(N-to-A)

0	300.0
1	100.0
-1	100.0

Define by channel relationships the maximum distance from an
undesired station to an analysis point. Stations beyond these
distances will not be considered when analyzing ATV to NTSC
interference.

The blank line at the end is necessary to terminate the list.

Channel Offset Max Distance - KM

(A-to-N)

0	300.0
1	100.0
2	35.0
3	35.0
4	35.0
7	35.0
8	35.0
-1	100.0
-2	35.0
-3	35.0
-4	35.0
-7	35.0
-8	35.0
14	35.0
15	35.0

#

Define by channel relationships the maximum distance from an
 # undesired station to an analysis point. Stations beyond these
 # distances will not be considered when analyzing ATV to ATV
 # interference.

The blank line at the end is necessary to terminate the list.

Channel Offset Max Distance - KM

(A-to-A)

0	300.0
1	100.0
-1	100.0

{END OF INPUT FILE}

Sideband masking assumed to improve first-adjacent A-to-A D/U ratios
 D/U Ratios in dB

Channel Offset	Intital Testing	Including Splatter	with assumed improvement
+1	-43.17	-21.15	-26.00
-1	-41.98	-22.83	-28.00

Analysis of: 8N PA LANCASTER

	POPULATION	AREA (sq km)
within Noise Limited Contour	3675233	28274.0
not affected by terrain losses	2859869	23984.9
lost to NTSC IX	695344	2253.4
lost to additional IX by ATV	5567	387.0
lost to all IX	700911	2640.4

Analysis of: 58A PA LANCASTER

HAAT 415.0 m, ATV ERP 382.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3675233	28274.0
not affected by terrain losses	3366946	25045.1
lost to NTSC IX	202672	878.8
lost to additional IX by ATV	987594	2716.9
lost to ATV IX only	1173123	2995.1
lost to all IX	1190266	3595.7
percent match ATV/NTSC	95.1	94.0

Analysis of: 9N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6388221	23831.3
lost to NTSC IX	88932	948.1
lost to additional IX by ATV	0	0.0
lost to all IX	88932	948.1

Analysis of: 34A DC WASHINGTON

HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6457299	24831.5
lost to NTSC IX	525	12.0
lost to additional IX by ATV	17101	196.0
lost to ATV IX only	17524	204.0
lost to all IX	17626	208.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 7N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6

not affected by terrain losses	6396262	23851.3
lost to NTSC IX	31916	636.1
lost to additional IX by ATV	0	0.0
lost to all IX	31916	636.1
Analysis of: 39A DC WASHINGTON		
HAAT 235.0 m, ATV ERP 1000.0 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6456127	24779.5
lost to NTSC IX	3485	120.0
lost to additional IX by ATV	448515	1328.2
lost to ATV IX only	450186	1372.2
lost to all IX	452000	1448.2
percent match ATV/NTSC	93.3	95.4
Analysis of: 9N NJ SECAUCUS		
	POPULATION	AREA (sq km)
within Noise Limited Contour	2597156	28901.4
not affected by terrain losses	2240791	26070.8
lost to NTSC IX	463063	3385.6
lost to additional IX by ATV	29122	527.0
lost to all IX	492185	3912.6
Analysis of: 38A NJ SECAUCUS		
HAAT 500.0 m, ATV ERP 136.4 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	2597156	28901.4
not affected by terrain losses	2349458	26989.0
lost to NTSC IX	49761	594.9
lost to additional IX by ATV	14183	179.7
lost to ATV IX only	20932	303.4
lost to all IX	63944	774.5
percent match ATV/NTSC	99.5	99.3
Analysis of: 63N NJ NEWTON		
	POPULATION	AREA (sq km)
within Noise Limited Contour	884998	13636.9
not affected by terrain losses	647734	11180.5
lost to NTSC IX	14450	197.0
lost to additional IX by ATV	1557	406.1
lost to all IX	16007	603.0
Analysis of: 8A NJ NEWTON		
HAAT 223.0 m, ATV ERP 3.2 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	884998	13636.9
not affected by terrain losses	819120	12933.3
lost to NTSC IX	168399	1254.3
lost to additional IX by ATV	1539	124.6
lost to ATV IX only	11418	197.0
lost to all IX	169938	1379.0
percent match ATV/NTSC	85.8	93.6
Analysis of: 7N NY NEW YORK		
	POPULATION	AREA (sq km)
within Noise Limited Contour	2577718	28765.7
not affected by terrain losses	2241829	26098.7
lost to NTSC IX	370186	2211.8
lost to additional IX by ATV	33126	475.1
lost to all IX	403312	2686.9
Analysis of: 45A NY NEW YORK		
HAAT 491.0 m, ATV ERP 164.3 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	2577718	28765.7
not affected by terrain losses	2321693	26741.5
lost to NTSC IX	31878	383.3
lost to additional IX by ATV	33017	303.4

lost to ATV IX only	43374	427.2
lost to all IX	64895	686.7
percent match ATV/NTSC	99.5	99.4

Analysis of: 53N NJ ATLANTIC CITY

	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 46A NJ ATLANTIC CITY

HAAT 85.0 m, ATV ERP 50.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

265041 calls to Longley-Rice; path distance increment 1.00 km

Analysis of DTV Channel 8

(Input file removed from summary)

Analysis of: 8N PA LANCASTER

	POPULATION	AREA (sq km)
within Noise Limited Contour	3675233	28274.0
not affected by terrain losses	2859869	23984.9
lost to NTSC IX	695344	2253.4
lost to additional IX by ATV	20326	1596.3
lost to all IX	715670	3849.7

Analysis of: 58A PA LANCASTER

HAAT 415.0 m, ATV ERP 382.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3675233	28274.0
not affected by terrain losses	3366946	25045.1
lost to NTSC IX	202672	878.8
lost to additional IX by ATV	987594	2716.9
lost to ATV IX only	1173123	2995.1
lost to all IX	1190266	3595.7
percent match ATV/NTSC	95.1	94.0

Analysis of: 9N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6388221	23831.3
lost to NTSC IX	88932	948.1
lost to additional IX by ATV	0	0.0
lost to all IX	88932	948.1

Analysis of: 34A DC WASHINGTON

HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6457299	24831.5
lost to NTSC IX	525	12.0
lost to additional IX by ATV	17101	196.0
lost to ATV IX only	17524	204.0
lost to all IX	17626	208.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 7N DC WASHINGTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6396262	23851.3
lost to NTSC IX	31916	636.1
lost to additional IX by ATV	0	0.0
lost to all IX	31916	636.1

Analysis of: 39A DC WASHINGTON

HAAT 235.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	6511733	26027.6
not affected by terrain losses	6456127	24779.5
lost to NTSC IX	3485	120.0
lost to additional IX by ATV	448515	1328.2
lost to ATV IX only	450186	1372.2
lost to all IX	452000	1448.2
percent match ATV/NTSC	93.3	95.4

Analysis of: 9N NJ SECAUCUS

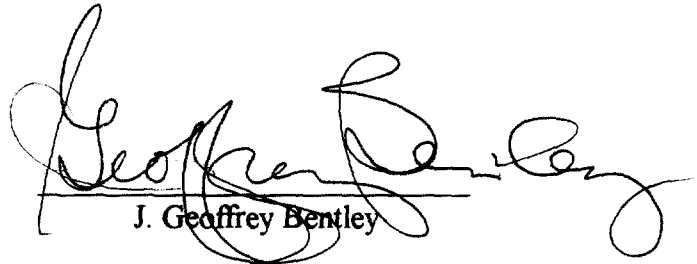
	POPULATION	AREA (sq km)
within Noise Limited Contour	2597156	28901.4
not affected by terrain losses	2240791	26070.8
lost to NTSC IX	463063	3385.6
lost to additional IX by ATV	29122	527.0

lost to all IX	492185	3912.6
Analysis of: 38A NJ SECAUCUS		
HAAT 500.0 m, ATV ERP 136.4 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	2597156	28901.4
not affected by terrain losses	2349458	26989.0
lost to NTSC IX	49761	594.9
lost to additional IX by ATV	14183	179.7
lost to ATV IX only	20932	303.4
lost to all IX	63944	774.5
percent match ATV/NTSC	99.5	99.3
Analysis of: 63N NJ NEWTON		
	POPULATION	AREA (sq km)
within Noise Limited Contour	884998	13636.9
not affected by terrain losses	647734	11180.5
lost to NTSC IX	14450	197.0
lost to additional IX by ATV	1557	406.1
lost to all IX	16007	603.0
Analysis of: 8A NJ NEWTON		
HAAT 223.0 m, ATV ERP 3.2 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	884998	13636.9
not affected by terrain losses	819120	12933.3
lost to NTSC IX	168399	1254.3
lost to additional IX by ATV	1620	148.8
lost to ATV IX only	35264	450.3
lost to all IX	170019	1403.1
percent match ATV/NTSC	85.8	93.6
Analysis of: 7N NY NEW YORK		
	POPULATION	AREA (sq km)
within Noise Limited Contour	2577718	28765.7
not affected by terrain losses	2241829	26098.7
lost to NTSC IX	370186	2211.8
lost to additional IX by ATV	33126	475.1
lost to all IX	403312	2686.9
Analysis of: 45A NY NEW YORK		
HAAT 491.0 m, ATV ERP 164.3 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	2577718	28765.7
not affected by terrain losses	2321693	26741.5
lost to NTSC IX	31878	383.3
lost to additional IX by ATV	33017	303.4
lost to ATV IX only	43374	427.2
lost to all IX	64895	686.7
percent match ATV/NTSC	99.5	99.4
Analysis of: 53N NJ ATLANTIC CITY		
	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0
Analysis of: 8A NJ ATLANTIC CITY		
HAAT 85.0 m, ATV ERP 16.0 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

CERTIFICATE OF SERVICE

I hereby certify that, this 20th day of April 1998, I caused a copy of the foregoing Petition for Reconsideration to be served by First Class United States mail, postage prepaid, on:

Pepper & Corazzini, L.L.P.
1776 K Street, N.W.
Suite 200
Washington, D.C. 20006
Counsel for WWAC-TV



J. Geoffrey Bentley